

287666

J. Ashley Cooper
Partner
 Telephone: 843.727.2674
 Direct Fax: 843.727.2680
 ashleycooper@parkerpoe.com

Atlanta, GA
 Charleston, SC
 Charlotte, NC
 Columbia, SC
 Greenville, SC
 Raleigh, NC
 Spartanburg, SC

September 27, 2019

Via Hand Delivery

Jocelyn G. Boyd
 Chief Clerk/Administrator
Public Service Commission of South Carolina
 Post Office Drawer 11649
 Columbia, SC 29211

RECEIVED
 2019 SEP 27 PM 4:00
 SC PUBLIC SERVICE
 COMMISSION

**Re: Beulah Solar, LLC – Joint Motion to Withdraw Motion to Maintain Status Quo
 and Request for Confidential Treatment
 Docket Number 2018-401-E**

Dear Ms. Boyd:

Dominion Energy South Carolina, Inc. ("DESC") (formerly South Carolina Electric & Gas) and Beulah Solar, LLC ("Solar Developer") hereby file with the Public Service Commission of South Carolina (the "Commission") the enclosed Joint Motion to Withdraw Motion to Maintain Status Quo (the "Joint Motion").

Solar Developer entered into an Interconnection Agreement ("IA") with DESC on September 24, 2018. On December 28, 2018, Solar Developer filed a Motion to Maintain Status Quo and a Request for Modification in the above-referenced docket. The Motion to Maintain Status Quo related to certain provisions of the IA. On September 25, 2019, the Commission issued Order No. 2019-689 (the "Order") approving a Settlement Agreement (the "Settlement") between DESC and Solar Developer which amicably resolved the issues pertaining to the Motion to Maintain Status Quo. Accordingly, DESC and Solar Developer now wish to withdraw the Motion to Maintain Status Quo by filing the Joint Motion.

However, due to the commercially sensitive and proprietary nature of the Settlement, as well as the highly competitive nature of the industry in which Solar Developer and DESC operate, DESC and Solar Developer have agreed to keep the terms of the Settlement confidential. Indeed, the Commission approved a request by DESC and Solar Developer to file the Settlement under seal. In accordance with the terms of the Settlement, DESC and Solar Developer now respectfully request that the Commission treat the Joint Motion in a similar manner by finding that the Joint Motion contains protected information and issue a protective order barring the disclosure of the Joint Motion under the Freedom of Information Act, S.C. Code Ann. §§ 30-4-10 et seq., S.C. Code Ann. Regs. 103-804(S)(1), or any other provision of law. Pursuant to S.C. Code Ann. Regs. 103-804(S)(2), the determination of whether a document may be exempt from disclosure is within the Commission's discretion.

To this end, and in accordance with Commission Order No. 2005-226, dated May 6, 2005, in Docket No. 2005-83-A, we enclose with this letter a redacted version of the Joint Motion that protects the sensitive information from disclosure, while making available for public viewing non-protected information. We also enclose a copy of the unredacted Joint Motion in a separate, sealed envelope and respectfully request that, in the event that anyone should seek disclosure of this unredacted version, the Commission notify DESC of such request and provide it with an opportunity to obtain an order from this Commission or a court of competent jurisdiction protecting the Joint Motion from disclosure.

Enclosed are the following:

1. A true and correct copy of the original Joint Motion in a sealed envelope marked "CONFIDENTIAL." Each page of the Joint Motion is also marked "CONFIDENTIAL."
2. Ten (10) copies of a redacted copy of the Joint Motion for filing and public disclosure.

By copy of this letter, we are providing the South Carolina Office of Regulatory Staff ("ORS") with a redacted copy of the Joint Motion for its records. Additionally, DESC will make the original, unredacted copy of the Joint Motion available to ORS for its review.

In conclusion, DESC and Solar Developer have amicably resolved the issues related to the Motion to Maintain Status Quo via the Settlement. DESC and Solar Developer come now with the Joint Motion contemplated thereby and request confidential treatment of the same. Thank you for your assistance and consideration of this matter. If you have any questions, please do not hesitate to contact me at your convenience.

Sincerely,

A handwritten signature in cursive script that reads "J. Ashley Cooper". The signature is written in black ink and is positioned above the printed name.

J. Ashley Cooper

JAC:hmp

cc: (Via Electronic Mail)
Richard L. Whitt
Jenny R. Pittman

2019 SEP 27 PM 4:00

SC PUERTO RICO
COMMISSION
STAT SERVICE
HYDRA

**JOINT MOTION TO WITHDRAW
MOTION TO MAINTAIN STATUS
QUO**

Beulah Solar, LLC - Request for Modification of an Interconnection Agreement with South Carolina Electric & Gas Company

Beulah Solar, LLC (“Beulah”) and Dominion Energy South Carolina, Inc. (formerly South Carolina Electric & Gas Company) (“DESC”) jointly, and without objection from the Office of Regulatory Staff, submit this Joint Motion to Withdraw Motion to Maintain Status Quo (the “Joint Motion”)

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

Respectfully submitted on this 27th day of September, 2019.

[SIGNATURE BLOCK APPEARS ON FOLLOWING PAGE]

Respectfully Submitted,

s/ J. Ashley Cooper
K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Dominion Energy South Carolina, Inc.
Mail Code C222
220 Operation Way
Cayce, South Carolina 29033-3701
Phone: (803) 217-8141
Fax: (803) 217-7810
Email: chad.burgess@scana.com

J. Ashley Cooper, Esquire
Parker Poe Adams & Bernstein LLP
200 Meeting Street
Suite 301
Charleston, South Carolina 29401
Phone: (843) 727-2674
Fax: (843) 727-2680
Email: ashleycooper@parkerpoe.com

*Attorneys for Dominion Energy South Carolina,
Inc.*

s/ Richard L. Whitt
Richard L. Whitt,
Whitt Law Firm, LLC
P.O. Box 362
Irmo, South Carolina 29063
Phone: (803) 995-7719
Email: Richard@RLWhitt.law

Attorney for Beulah Solar, LLC